EXHIBIT 6

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1
                 IN THE UNITED STATES DISTRICT COURT
        NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
 2
 3
        CHASOM BROWN, WILLIAM BYATT,
 4
        JEREMY DAVIS, CHRISTOPHER CASTILLO,)
5
        and MONIQUE TRUJILLO, individually )
        and on behalf of all others
 6
        similarly situated,
                                            )
             Plaintiffs,
7
                                             ) Case No.:
                                               5:20-cv-03664-LHK-SVK
            vs.
8
        GOOGLE, LLC,
9
             Defendant.
10
11
12
13
14
                             CONFIDENTIAL
           VIDEO-RECORDED REMOTE DEPOSITION OF STEVE GANEM
15
16
                    Huntington Beach, California
17
                Wednesday, March 23, 2022; 12:37 p.m.
18
19
20
21
22
        REPORTED BY:
23
        Victoria A. Guerrero, CSR, RPR, RMR, CRR
24
        Job No. 5130916
25
        Pages 1 - 113
                                                               Page 1
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1
                 IN THE UNITED STATES DISTRICT COURT
        NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
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        CHASOM BROWN, WILLIAM BYATT,
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        and on behalf of all others
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        similarly situated,
             Plaintiffs,
7
                                              Case No.:
                                               5:20-cv-03664-LHK-SVK
            vs.
8
       GOOGLE, LLC,
9
             Defendant.
10
11
12
13
14
15
             BE IT REMEMBERED that, pursuant to Federal
16
       Rules of Civil Procedure, the deposition of STEVE
17
       GANEM was taken before Victoria A. Guerrero,
18
       California Certified Shorthand Reporter, Registered
19
20
       Merit Reporter, and Certified Realtime Reporter, on
       Wednesday, March 23, 2022, commencing at the hour of
21
22
        12:37 p.m., the witness responding to questions by
23
       videoconference from Huntington Beach, California;
24
        the questions being propounded and proceedings
25
        reported remotely via videoconference.
                                                              Page 2
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1	REMOTE APPEARANCES:
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22	ALSO PRESENT:
23	Matthew Gubiotti, Google in-house counsel
24	Sean Grant, Videographer
25	
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4	EXAMINATION:	PAGE	LINE
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1		INDEX TO EXHIBITS		
2		STEVE GANEM		
3	B	Brown, et al. vs. Google		
4	W	Jednesday, March 23, 2022		
5	Victoria	A. Guerrero, CSR, RPR, RMR, CRR		
6				
	MARKED	DESCRIPTION	PAGE	LINE
7				
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8		GOOG-BRWN-00026812 through		
		26830		
9				
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10		Conversation;		
		GOOG-CABR-00381312 through		
11		00381576		
12	Exhibit 3	Declaration of Steve Ganem	60	1
		Regarding Google Analytics in		
13		Opposition to Plaintiffs'		
		Motion for Class Certification		
14		(No Bates)		
15	Exhibit 4	Slide deck produced by	71	10
		S. Pothana; GOOG-BRWN-00550613		
16		through 00550644		
17	Exhibit 5	6/25/21 email to S. Pothana	91	9
		from S. Ganem;		
18		GOOG-BRWN-00597920 through		
		00597922		
19				
20		* * *		
21				
22				
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24				
25				
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1	Wednesday, March 23, 2022; 12:37 p.m.	
2	Huntington Beach, California	
3	00000	
4	THE VIDEOGRAPHER: Good afternoon. We're	12:37:19
5	on the record. The time is 12:37 p.m. and the date	12:37:24
6	is March 23rd, 2022. This is the videotaped	12:37:28
7	deposition of Steve Ganem. This deposition is being	12:37:34
8	taken on behalf of counsel for plaintiff in the	12:37:37
9	matter of Brown, Chasom vs. Google LLC. This case	12:37:40
10	is filed in the United States District Court,	12:37:45
11	Northern District of California, Case	12:37:46
12	No. 5:20-cv-03664-LHK-SVK, and is being held	12:37:49
13	remotely by Veritext.	12:38:00
14	My name is Sean Grant from the firm	12:38:01
15	Veritext, I'm the videographer. And the court	12:38:03
16	reporter is Victoria Guerrero, also from Veritext.	12:38:05
17	Please note that audio and video recording	12:38:09
18	will take place unless all parties have agreed to go	12:38:11
19	off the record.	12:38:15
20	At this time, will counsel please identify	12:38:16
21	themselves and state whom they represent beginning	12:38:19
22	with Ms. Nyborg-Burch?	12:38:22
23	MS. NYBORG-BURCH: Erica Nyborg-Burch from	12:38:27
24	Boies Schiller Flexner for plaintiff. And with me	12:38:34
25	on behalf of plaintiffs also from Boies Schiller	12:38:34
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1	Flexner are Beko Reblitz-Richardson and Mark Mao.	12:38:34
2	MS. OLSON: Aly Olson from Quinn Emanuel,	12:38:37
3	counsel for Google. With me is Stephen Broome, also	12:38:39
4	from Quinn Emanuel; and Matthew Gubiotti, in-house	12:38:44
5	counsel at Google.	12:38:47
6	THE VIDEOGRAPHER: Thank you. Will the	12:38:50
7	certified court reporter please swear in the	12:38:50
8	witness?	12:38:52
9	00000	12:38:52
10	Whereupon, STEVE GANEM, having first been	12:38:52
11	sworn by the California Certified Shorthand	12:38:52
12	Reporter, testified under oath as follows:	12:38:52
13		12:38:52
14	EXAMINATION	12:38:52
15		12:38:52
16	BY MS. NYBORG-BURCH:	12:39:08
17	Q Good afternoon. Please state your full	12:39:09
18	name.	12:39:11
19	A Steve Ganem.	12:39:16
20	Q And you've been deposed before, correct?	12:39:17
21	A Yes.	12:39:18
22	Q And do you understand that you're under	12:39:19
23	oath today?	12:39:21
24	A I do.	12:39:27
25	Q And is there any reason you cannot testify	12:39:28
		Page 7

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1	(Exhibit 3, Declaration of Steve Ganem	14:29:50
2	Regarding Google Analytics in Opposition to	14:29:51
3	Plaintiffs' Motion for Class Certification	14:29:51
4	(No Bates), was marked.)	14:29:51
5	BY MS. NYBORG-BURCH:	14:29:52
6	Q I should be introducing Exhibit 3. Can you	14:30:01
7	let me know when you have that in front of you?	14:30:04
8	A I'll let you know. Are we done with	14:30:06
9	Exhibit 2?	14:30:09
10	Q Yes, thank you.	14:30:10
11	A I'll let you know when I see Exhibit 3 show	14:30:23
12	in the drive folder.	14:30:26
13	Q Thank you so much.	14:30:27
14	A I just saw it appear.	14:30:30
15	Q And as you will see, Exhibit 3 is a copy of	14:30:32
16	your declaration from the Calhoun matter.	14:30:37
17	Do you recognize Exhibit 3?	14:30:42
18	A Yes, I recognize it.	14:30:53
19	Q Okay. And I'm going to ask you if you	14:30:55
20	could please turn to paragraph 24(a)?	14:30:58
21	A I see it. Can I have a minute to	14:31:26
22	refamiliarize myself with this declaration, please?	14:31:29
23	Q Of course. Go ahead.	14:31:32
24	A Okay. I'm at 24(a).	14:34:56
25	Q Did you have a chance to read 24(a)?	14:35:03
		Page 60

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1	А	Yes.	14:35:11
2	Q	Thank you. And do you see where you	14:35:12
3	describe	in that paragraph how enabling "block all	14:35:14
4	cookies"	in Chrome affects what data Google receives	14:35:18
5	with Goog	gle Analytics?	14:35:22
6	А	Yes.	14:35:27
7	Q	Is there any difference in terms of how	14:35:30
8	that work	ks with Chrome Incognito as compared to	14:35:34
9	Chrome w	ithout being in an Incognito tab?	14:35:43
10		MS. OLSON: Objection. Vague.	14:35:50
11		THE WITNESS: Can you be more specific?	14:36:00
12	BY MS. NY	YBORG-BURCH:	14:36:02
13	Q	Sure. So in paragraph 28 (sic) it says,	14:36:03
14	When the	user enables the feature, Chrome prevents	14:36:07
15	websites	and Google Analytics from sending any	14:36:13
16	cookies.	If all cookies are blocked in this manner,	14:36:15
17	the Goog	le Analytics tag will not be able to send	14:36:17
18	this cool	kie value to Google Analytics.	14:36:20
19		And my question is, is there any difference	14:36:24
20	in terms	of how what you described in this paragraph	14:36:25
21	works if	a user is in a Chrome Incognito is	14:36:30
22	browsing	with Chrome Incognito?	14:36:35
23	А	I'm sorry. I got confused. You said	14:36:38
24	paragraph	1 28?	14:36:40
25	Q	24(a), I'm sorry.	14:36:41
			Page 61

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1 A Okay. Can you repeat it again? Sorry. 14:36:43 2 Q Sure. When a user enables this feature, 14:36:48 3 Chrome prevents websites and Google Analytics from 14:36:55 4 sending any cookiee. This is reading from the 14:36:57 5 declaration. 14:37:02 6 If all cookies are blocked in this manner 14:37:02 7 they will go sorry. I'm just going to read 14:37:04 8 directly from here. The Google Analytics tag will 14:37:08 9 not be able to send those cookie values to Google 14:37:11 10 Analytics. 14:37:13 11 And my question for you was, is there any 14:37:14 12 difference in terms of how this process you describe 14:37:19 13 in 24(a) works if a user is browsing in Chrome 14:37:23 14 Incognito? 14:37:30 15 A If the user has enabled the 'block all 14:37:35 16 cookies" setting, then the behavior I describe in 14:37:46 17 24(a) applies whether or not Incognito session is in 14:37:46 18 progrees. 14:37:56 19 Q Understood. So for the period back to 14:38:00 20 June 1st, 2016, do you have any information 14:38:02 21 regarding the number of Chrome Incognito users who 14:38:07 22 were browsing after having enabled the "block all 14:38:12 23 cookies" setting? 14:38:15 24 MS. OLSON: Objection. Vague. Calls for 14:38:20 25 speculation. 14:38:21			
Chrome prevents websites and Google Analytics from 14:36:55 sending any cookies. This is reading from the 14:36:57 declaration. 14:37:02 If all cookies are blocked in this manner 14:37:02 they will go sorry. I'm just going to read 14:37:04 directly from here. The Google Analytics tag will 14:37:08 not be able to send those cookie values to Google 14:37:11 Analytics. 14:37:13 And my question for you was, is there any 14:37:14 difference in terms of how this process you describe 14:37:19 in 24(a) works if a user is browsing in Chrome 14:37:23 Incognito? 14:37:30 A If the user has enabled the "block all 14:37:40 cookies" setting, then the behavior I describe in 14:37:46 progress. 14:37:56 Q Understood. So for the period back to 14:38:00 June 1st, 2016, do you have any information 14:38:02 regarding the number of Chrome Incognito users who 14:38:07 were browsing after having enabled the "block all 14:38:12 cookies" setting? 14:38:15 MS. OLSON: Objection. Vague. Calls for 14:38:20 speculation. 14:38:21	1	A Okay. Can you repeat it again? Sorry.	14:36:43
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regarding the number of Chrome Incognito users who 14:38:07 were browsing after having enabled the "block all 14:38:12 cookies" setting? 14:38:15 MS. OLSON: Objection. Vague. Calls for 14:38:20 speculation. 14:38:21	19	Q Understood. So for the period back to	14:38:00
were browsing after having enabled the "block all 14:38:12 cookies" setting? 14:38:15 MS. OLSON: Objection. Vague. Calls for 14:38:20 speculation. 14:38:21	20	June 1st, 2016, do you have any information	14:38:02
23 cookies" setting? 14:38:15 24 MS. OLSON: Objection. Vague. Calls for 14:38:20 25 speculation. 14:38:21	21	regarding the number of Chrome Incognito users who	14:38:07
MS. OLSON: Objection. Vague. Calls for 14:38:20 25 speculation. 14:38:21	22	were browsing after having enabled the "block all	14:38:12
25 speculation. 14:38:21	23	cookies" setting?	14:38:15
	24	MS. OLSON: Objection. Vague. Calls for	14:38:20
Page 62	25	speculation.	14:38:21
			Page 62

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1	THE WITNESS: Can you be more specific	14:38:33
2	about the type of information you're referring to?	14:38:34
3	BY MS. NYBORG-BURCH:	14:38:36
4	Q I'm referring to information that could	14:38:41
5	include statistics, counts of the number of Chrome	14:38:43
6	Incognito users who enabled "block all cookies," and	14:38:53
7	used Chrome Incognito mode with that setting	14:39:01
8	enabled.	14:39:04
9	MS. OLSON: Same objections.	14:39:09
10	THE WITNESS: Personally, I do not have	14:39:12
11	I have not seen any such information.	14:39:16
12	BY MS. NYBORG-BURCH:	14:39:18
13	Q And are you aware of whether Google	14:39:18
14	collects such information or would have that	14:39:21
15	information?	14:39:23
16	MS. OLSON: Objection. Calls for	14:39:25
17	speculation.	14:39:26
18	THE WITNESS: I'm not aware.	14:39:31
19	BY MS. NYBORG-BURCH:	14:39:33
20	Q And if someone enables "block all cookies"	14:39:35
21	and then goes into a starts a Chrome Incognito	14:39:39
22	window, will "block all cookies" remain enabled in	14:39:45
23	Chrome Incognito?	14:39:51
24	A I'm not a Chrome product manager, so I	14:40:06
25	don't know that for certain.	14:40:08
		Page 63

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1	Q How about this one: If someone enabled	14:40:14
2	"block all cookies" and then opens a new window in	14:40:17
3	Chrome the following day, do you know if that	14:40:22
4	setting is still enabled?	14:40:26
5	MS. OLSON: Objection. Lacks foundation.	14:40:29
6	THE WITNESS: Again, not being a product	14:40:36
7	manager on Chrome, I am not familiar with how it	14:40:37
8	behaves under those circumstances.	14:40:43
9	BY MS. NYBORG-BURCH:	14:40:45
10	Q Do you know if there's a way to block only	14:40:46
11	Google Analytics' cookies?	14:40:49
12	MS. OLSON: Objection. Lacks foundation.	14:40:57
13	THE WITNESS: An end user could install the	14:41:09
14	Google Analytics opt-out Chrome extension to prevent	14:41:12
15	cookie-derived information from being uploaded to	14:41:17
16	Google Analytics.	14:41:20
17	BY MS. NYBORG-BURCH:	14:41:24
18	Q And is that the only way to block only	14:41:25
19	Google Analytics' cookies?	14:41:29
20	A Google Analytics' customers, the owners of	14:41:46
21	the website, can also implement their own controls	14:41:50
22	to give users consent for the use of cookies from	14:41:54
23	Google Analytics.	14:41:58
24	Q And so leaving aside customer controls for	14:41:59
25	a user, is installing the Chrome opt-out extension	14:42:02
		Page 64

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1	the only way to block only Google Analytics cookies?	14:42:10
2	A I can't say that categorically. It's the	14:42:26
3	only way.	14:42:28
4	Q Do you know another way?	14:42:30
5	A There may be other similar extensions or	14:42:31
6	plug-ins available in the Chrome store that I	14:42:34
7	haven't searched for myself.	14:42:38
8	Q Okay. And when someone is browsing in	14:42:40
9	Chrome with this "block all cookies" setting turned	14:42:46
10	on, does Google Analytics receive any information	14:42:51
11	from their activities on websites that are Google	14:42:56
12	Analytics' customers who have installed Google	14:42:59
13	Analytics' tags?	14:43:02
14	MS. OLSON: Objection. Calls for	14:43:06
15	speculation. Vague.	14:43:07
16	THE WITNESS: Can you repeat the question,	14:43:26
17	please?	14:43:28
18	BY MS. NYBORG-BURCH:	14:43:28
19	Q Sure. When someone is browsing in Chrome	14:43:29
20	with this "block all cookies" setting turned on,	14:43:30
21	does Google Analytics receive any information from	14:43:34
22	their activities on websites that are Google	14:43:36
23	Analytics customers who have installed Google	14:43:40
24	Analytics tags?	14:43:42
25	MS. OLSON: Same objections.	14:43:46
		Page 65

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1	THE WITNESS: I think that would depend on	14:43:56
2	a number of factors including whether or not the end	14:43:57
3	user has enabled the Google Analytics opt-out.	14:44:00
4	BY MS. NYBORG-BURCH:	14:44:05
5	Q And if the only setting that the user has	14:44:11
6	enabled is Chrome's "block all cookies" setting,	14:44:16
7	does Google Analytics receive any information from	14:44:21
8	the user's activities on websites that use Google	14:44:24
9	Analytics?	14:44:28
10	MS. OLSON: Objection. Calls for	14:44:29
11	speculation. Vague.	14:44:31
12	THE WITNESS: It would also depend on	14:44:37
13	developer settings and whether developer has	14:44:38
14	installed Google Analytics and enabled it on the	14:44:41
15	given page, whether they've used other consent	14:44:44
16	mechanisms as well.	14:44:50
17	BY MS. NYBORG-BURCH:	14:44:52
18	Q Right. So I understand that the developers	14:44:53
19	can configure the setting a particular way. If	14:44:57
20	we're looking just at the user controls, my question	14:45:02
21	is whether if a user has only enabled the "block all	14:45:06
22	cookies" setting, whether Google Analytics receives	14:45:12
23	any information from the user's activity on websites	14:45:15
24	that use Google Analytics?	14:45:19
25	MS. OLSON: Objection. Vague. Asked and	14:45:24
		Page 66

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1	answered.	14:45:26
2	THE WITNESS: I'm not entirely sure what	14:45:41
3	happens in those circumstances. Cookies will	14:45:43
4	certainly will not be uploaded when "block all	14:45:49
5	cookies" is enabled and when Analytics is not	14:45:52
6	disabled by the various mechanisms that I listed.	14:45:55
7	BY MS. NYBORG-BURCH:	14:46:00
8	Q Let's look at paragraph 24(b); do you see	14:46:01
9	that paragraph?	14:46:08
10	A Yes.	14:46:09
11	Q Is it fair to say that in paragraph 24(b)	14:46:10
12	you decide how enabling "block third-party cookies"	14:46:14
13	in Chrome settings affects the data Google receives	14:46:18
14	with Google Analytics?	14:46:22
15	A Yes. As I said in my declaration in 24(b),	14:46:36
16	when this "block third-party cookies" setting is	14:46:40
17	enabled, Google Analytics does not receive data	14:46:44
18	associated with any third-party cookies.	14:46:46
19	Q And if a user has turned on the "block	14:46:53
20	third-party cookies" setting in Chrome, but has not	14:46:57
21	turned on the "block all cookies" setting in Chrome,	14:47:00
22	are there any cookies that Google Analytics can	14:47:07
23	send? I'm sorry. Can set, I should say.	14:47:12
24	A I'm sorry. Could you repeat the question?	14:47:25
25	Q Sure. Let me get it all in one.	14:47:27
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1 If a user has turned on the "block 14:47:29 2 third-party cookies" setting in Chrome, but has not 14:47:32 3 turned on the "block all cookies" setting in Chrome, 14:47:35 4 are there any cookies that Google Analytics can set? 14:47:39 5 MS. OLSON: Objection to form. 14:47:44 6 THE WITNESS: Under those circumstances, 14:47:56 7 it's possible that first-party cookies could still 14:47:57 8 be set. 14:48:01 9 BY MS. NYBORG-BURCH: 14:48:03 10 Q If you know, is there any difference in 14:48:04 11 terms of how blocking third-party cookies works when 14:48:06 12 a user is in Chrome Incognito mode compared to what 14:48:11 13 you described in paragraph 24(b)? 14:48:15
turned on the "block all cookies" setting in Chrome, 14:47:35 are there any cookies that Google Analytics can set? 14:47:39 MS. OLSON: Objection to form. 14:47:44 THE WITNESS: Under those circumstances, 14:47:56 it's possible that first-party cookies could still 14:47:57 be set. 14:48:01 BY MS. NYBORG-BURCH: 14:48:03 Q If you know, is there any difference in 14:48:04 terms of how blocking third-party cookies works when 14:48:06 a user is in Chrome Incognito mode compared to what 14:48:11
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Q If you know, is there any difference in 14:48:04 terms of how blocking third-party cookies works when 14:48:06 a user is in Chrome Incognito mode compared to what 14:48:11
terms of how blocking third-party cookies works when 14:48:06 a user is in Chrome Incognito mode compared to what 14:48:11
a user is in Chrome Incognito mode compared to what 14:48:11
you described in paragraph 24(b)? 14:48:15
A When a user starts an Incognito session in 14:48:33
Chrome today, third-party cookies are disabled or 14:48:39
16 blocked by default and they have to turn them on 14:48:45
17 manual. 14:48:47
Q And do you know when that change happened 14:48:50
that third-party cookies were blocked by default in 14:48:58
20 Chrome Incognito mode? 14:49:03
21 A Not specifically, no. 14:49:13
MS. OLSON: It's been about another hour. 14:49:15
Do you mind taking a break? 14:49:16
MS. NYBORG-BURCH: Yeah. I have one last 14:49:19
MS. NYBORG-BURCH: Yeah. I have one last 14:49:19 question on this paragraph and then we'll take a 14:49:20

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1	break. Does that work?	14:49:22
2	MS. OLSON: Yes. If it works for	14:49:24
3	Mr. Ganem.	14:49:25
4	THE WITNESS: It works for me.	14:49:25
5	BY MS. NYBORG-BURCH:	14:49:26
6	Q Thank you.	14:49:26
7	For the period back to June 1st, 2016, do	14:49:31
8	you have any information regarding the number of	14:49:36
9	Chrome Incognito users who have enabled "block	14:49:39
10	third-party cookies" before it was blocked by	14:49:44
11	default?	14:49:46
12	MS. OLSON: Objection. Vague and	14:49:47
13	ambiguous. Calls for speculation.	14:49:48
14	THE WITNESS: I have personally not seen	14:49:57
15	such data in my time at Google.	14:49:59
16	MS. NYBORG-BURCH: Okay. Thanks. Let's go	14:50:04
17	off the record.	14:50:05
18	THE VIDEOGRAPHER: Off the record. The	14:50:06
19	time is 2:50 p.m.	14:50:07
20	(Off the record.)	14:50:09
21	THE VIDEOGRAPHER: Back on the record. The	15:03:03
22	time is 3:03 p.m.	15:03:04
23	BY MS. NYBORG-BURCH:	15:03:15
24	Q Good afternoon, Mr. Ganem. Can you hear	15:03:15
25	me?	15:03:16
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1	A I can.	15:03:17
2	Q Can you please turn to paragraph 24(e) of	15:03:18
3	the declaration we were looking at before the break?	15:03:23
4	A 24(b)?	15:03:26
5	Q E, as in elephant.	15:03:38
6	A Okay. I'm there.	15:03:40
7	Q And do you see in paragraph 24(e) where you	15:03:41
8	describe how users can install the Google Analytics	15:03:43
9	opt-out browser add-on?	15:03:47
10	A Yes.	15:03:56
11	Q And if you know, does the Analytics opt-out	15:04:00
12	browser work in Incognito mode?	15:04:04
13	MS. OLSON: Objection. Lacks foundation.	15:04:20
14	Calls for speculation.	15:04:24
15	THE WITNESS: I'm not certain. There's a	15:04:31
16	separate team which handles the tagging side of	15:04:39
17	Google Analytics that would know the specifics.	15:04:42
18	BY MS. NYBORG-BURCH:	15:04:45
19	Q And what team is that?	15:04:46
20	A They're known as the tagging team.	15:04:52
21	Q Thank you. And do you know how many people	15:04:56
22	annually install the Analytics opt-out browser	15:04:59
23	add-on?	15:05:05
24	MS. OLSON: Objection. Calls for	15:05:07
25	speculation.	15:05:07
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1	THE WITNESS: I don't know. I, in six	15:05:25
2	years in Google Analytics, haven't ever seen a	15:05:27
3	number like that.	15:05:29
4	BY MS. NYBORG-BURCH:	15:05:32
5	Q Okay. We're going to move on. I'm	15:05:33
6	introducing now what will be marked as Exhibit 4.	15:05:35
7	Will you please let me know when you have Exhibit 4	15:05:40
8	in front of you?	15:05:42
9	A Will do. Okay. It just showed up.	15:05:43
10	(Exhibit 4, Slide deck produced by S.	15:06:21
11	Pothana; GOOG-BRWN-00550613 through	15:06:22
12	00550644, was marked.)	15:06:22
13	BY MS. NYBORG-BURCH:	15:06:22
14	Q And for the record, Exhibit 4 is	15:06:23
15	GOOG-BRWN-00550613. And if you look on the last	15:06:25
16	page there we've included the metadata from Google.	15:06:39
17	And you'll see that the document is produced from	15:06:43
18	the files of Sree Pothana. Because you were not a	15:06:45
19	document custodian in this case, we don't have	15:06:50
20	information regarding whether or not you've seen 15:06:52	
21	this before. 15:06:54	
22	As you're looking at it, can you let me	15:06:56
23	know if you recall whether you've ever seen this	15:06:58
24	document?	15:07:00
25	A Let me look through it a little bit.	15:07:07
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1	THE VIDEOGRAPHER: Going off the record.	16:36:19
2	The time is 4:36 p.m.	16:36:19
3	(Off the record.)	16:36:21
4	THE VIDEOGRAPHER: Back on the record. The	16:45:29
5	time is 4:45 p.m.	16:45:30
6	MS. OLSON: I have no questions at this	16:45:31
7	time.	16:45:32
8	MS. NYBORG-BURCH: All right. Should we go	16:45:37
9	off the record, then?	16:45:38
10	MS. OLSON: Yes.	16:45:39
11	THE VIDEOGRAPHER: This concludes today's	16:45:41
12	videotaped deposition of Steve Ganem. We are off	16:45:42
13	the record at 4:46 p.m. Thank you.	16:45:46
14	(Proceedings ended at 4:46 p.m.)	
15	(Signature reserved.)	
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24		
25		
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1 REPORTER'S CERTIFICATE 2 I, VICTORIA A. GUERRERO, California Certified Shorthand Reporter, Registered Merit Reporter, Certified Realtime 3 Reporter, do hereby certify that, pursuant to Federal Rules 4 of Civil Procedure, STEVE GANEM appeared remotely before me 5 at the time and place mentioned in the caption herein; that 6 the witness was, by me, first duly sworn/affirmed under oath 7 and examined upon oral interrogatories propounded by 8 counsel; 9 that said examination together with the testimony of 10 said witness was taken down by me in stenotype and 11 transcribed through computer-aided transcription; I further 12 certify that I am not a relative or employee of any attorney 13 of the parties, nor financially interested in the action; 14 15 and the foregoing transcript, pages 1 through 109, 16 review requested by the witness or a party, constitutes a full, true, and correct record of such testimony adduced and 17 18 oral proceedings had and of the whole thereof. 19 WITNESS MY HAND AND DIGITAL SIGNATURE this Monday, March 28, 2022. 20 21 22 Victoria A. Guerrero, CSR, RMR, CRR 23 Oregon CSR No. 14-0428 (exp. 6-30-2023) Washington CCR No. 3293 (exp. 3-15-2023) 24 California CSR No. 8370 (exp. 3-15-2023) 25 Hawaii CSR No. 490 (exp. 12-31-2022)Page 110

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```
1
     ALY OLSON, ESQ.
 2
     alyolson@quinnemanuel.com
                                                MARCH 28, 2022
 3
     RE: BROWN V. GOOGLE
 4
     MARCH 23, 2022, STEVE GANEM, JOB NO. 5130916
 5
6
     The above-referenced transcript has been
      completed by Veritext Legal Solutions and
7
8
     review of the transcript is being handled as follows:
9
      ___ Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext
10
         to schedule a time to review the original transcript at
         a Veritext office.
11
12
      ___ Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF
         Transcript - The witness should review the transcript and
13
14
        make any necessary corrections on the errata pages included
        below, notating the page and line number of the corrections.
15
16
         The witness should then sign and date the errata and penalty
17
         of perjury pages and return the completed pages to all
         appearing counsel within the period of time determined at
18
19
         the deposition or provided by the Code of Civil Procedure.
       _ Waiving the CA Code of Civil Procedure per Stipulation of
20
         Counsel - Original transcript to be released for signature
21
         as determined at the deposition.
22
      ___ Signature Waived - Reading & Signature was waived at the
23
24
         time of the deposition.
25
                                                            Page 111
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1	_X_ Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF
2	Transcript - The witness should review the transcript and
3	make any necessary corrections on the errata pages included
4	below, notating the page and line number of the corrections.
5	The witness should then sign and date the errata and penalty
6	of perjury pages and return the completed pages to all
7	appearing counsel within the period of time determined at
8	the deposition or provided by the Federal Rules.
9	Federal R&S Not Requested - Reading & Signature was not
10	requested before the completion of the deposition.
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1	BROWN V. GOOGLE
2	STEVE GANEM (#5130916)
3	ERRATA SHEET
4	PAGE LINE CHANGE
5	
6	REASON
7	PAGE LINE CHANGE
8	
9	REASON
10	PAGE LINE CHANGE
11	
12	REASON
13	PAGE LINE CHANGE
14	
15	REASON
16	PAGE LINE CHANGE
17	
18	REASON
19	PAGE LINE CHANGE
20	
21	REASON
22	
23	
24	WITNESS Date
25	
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Deposition Errata Sheet
Case: Brown, et al. v. Google LLC
Deponent: Steve Ganem
Date of Deposition: March 23, 2022

I, Steve Ganem, hereby certify that I have read the transcript of my testimony taken under oath in my deposition on the 23rd day of March, 2022; that the transcript is a true, complete record of my testimony and that the answers on the record as given by me are true and correct, with the following exceptions

Pg. and Ln.	Now Reads	Should Read	Reason
Pg: 10 Ln: 21	the	a	Transcription Error
Pg: 11 Ln: 18	customers which	customers, which	Punctuation
Pg: 11 Ln: 19	apps so	apps, so	Punctuation
Pg: 15 Ln: 22	skew	SKU	Transcription Error
Pg: 20 Ln: 3	has configuration	has a configuration	Transcription Error
Pg: 21 Ln: 23	publishes a "list"	"publishes a list"	Punctuation
Pg: 27 Ln: 12	, can	or could	Transcription Error
Pg: 33 Ln: 7	that it would	that would	Transcription Error
Pg: 33 Ln: 15	a	"A	Punctuation Capitalization
Pg: 33 Ln: 16		."	Punctuation
Pg: 36 Ln: 20	Visits	Visit	Transcription Error
Pg: 36 Ln: 25	visit	"Visit	Punctuation Capitalization
Pg: 37 Ln: 1	association.	session.	Transcription Error
Pg: 37 Ln: 4	Analytics	Analytics'	Punctuation
Pg: 37 Ln: 6	"session"	'session'	Punctuation
Pg: 37 Ln: 7		."	Punctuation
Pg: 43 Ln: 17	Generally	I'm generally	Transcription Error
Pg: 46 Ln: 2	understood	understand	Transcription Error
Pg: 47 Ln: 22	in context.	in this context	Transcription Error

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Pg. and Ln.	Now Reads	Should Read	Reason
Pg: 48 Ln: 6	this data	in the state it	Transcription Error
Pg: 48 Ln: 7	drafted. Google	drafted Google	Punctuation
Pg: 52 Ln: 1	prompts	projects	Transcription Error
Pg: 52 Ln: 21	a causation	causation	Transcription Error
Pg: 52 Ln: 23	uplifts. The	uplifts, the	Punctuation
Pg: 53 Ln: 19	spent	spend	Transcription Error
Pg: 55 Ln: 5	our	or	Transcription Error
Pg: 56 Ln: 18	to, maybe, directors.	to a new director	Transcription Error
Pg: 62 Ln: 17	not Incognito	not an Incognito	Transcription Error
Pg: 65 Ln: 2	categorically. It's	categorically it's	Punctuation
Pg: 66 Ln: 13	whether developer	whether the developer	Transcription Error
Pg: 68 Ln: 17	manual	manually	Transcription Error
Pg: 70 Ln: 20	tagging	Tagging	Capitalization
Pg: 72 Ln: 9	is, Create	is "Create	Punctuation
Pg: 72 Ln: 10		."	Punctuation
Pg: 73 Ln: 14	by	like	Transcription Error
Pg: 75 Ln: 17	operational	optional	Transcription Error
Pg: 77 Ln: 3	cookies. And	cookies and	Punctuation Capitalization
Pg: 77 Ln: 5	for later	earlier	Transcription Error
Pg: 82 Ln: 14	to the	tothe	Punctuation
Pg: 83 Ln: 6	scripts, JavaScripts	scriptsJavaScripts	Punctuation
Pg: 83 Ln: 8	data's	data is	Transcription Error
Pg: 84 Ln: 23	Will	"will	Punctuation
Pg: 84 Ln: 23	observed	observe	Transcription Error

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Pg. and Ln.	Now Reads	Should Read	Reason
Pg: 84 Ln: 23	the	their	Transcription Error
Pg: 84 Ln: 24	cookies?	cookies."	Punctuation
Pg: 85 Ln: 9	these are lanes (phonetic)	when the user lands	Transcription Error
Pg: 92 Ln: 2	operationally	optionally	Transcription Error
Pg: 92 Ln: 3	customer, opaque	customeropaque	Punctuation
Pg: 93 Ln: 24	expectation, we	expectationwe	Punctuation
Pg: 94 Ln: 12	customer's	customers'	Punctuation
Pg: 97 Ln: 19	We	"we	Punctuation
Pg: 97 Ln: 20	joinable,	joinable"	Punctuation
Pg: 98 Ln: 22	impossible. So	impossible so	Punctuation Capitalization
Pg: 100 Ln: 3	be no	bethere is no	Transcription Error
Pg: 100 Ln: 4	. And some	and so	Transcription Error
Pg: 101 Ln: 16	theory; but	theorybut	Punctuation
Pg: 101 Ln: 17	. Could	could	Punctuation Capitalization
Pg: 102 Ln: 6	is, Okay.	is "Ok."	Punctuation Spelling
Pg: 102 Ln: 10	she	Sree	Transcription Error
Pg: 102 Ln: 10	writes, We	writes, "we	Punctuation
Pg: 102 Ln: 12	example.	example."	Punctuation
Pg: 104 Ln: 1	and	on	Transcription Error

Dated: 3/31/2022	By:
	Steve Ganem